

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Planet Aid, Inc., and Lisbeth Thomsen,

Plaintiffs,

v.

Reveal, Center for Investigative Reporting,
Matt Smith, and Amy Walters,

Defendants.

Civil Docket No. 1:16-cv-02974 (GLR)

DECLARATION OF AMY PYLE IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND
IMPROPER VENUE, OR IN THE ALTERNATIVE TO TRANSFER VENUE

I, Amy Pyle, declare:

1. I am over the age of 18 and have personal knowledge of the facts stated in this declaration and could competently testify them if called as a witness. I make this declaration in support of Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue, or In the Alternative to Transfer Venue.
2. I am the Editor in Chief of the Center for Investigative Reporting ("CIR"). I have been employed full-time as an employee of CIR since June 2012.

3. I have an undergraduate degree from Mills College (1980) and a graduate degree in journalism from Medill School of Journalism, Northwestern University (1983). I was part of teams that won four Pulitzer Prizes at the *Los Angeles Times*, including for Northridge Earthquake coverage that I oversaw as assignment editor in the San Fernando Valley. Projects I have edited and managed have won numerous national and international awards, including the Overseas Press Club award, the George Polk Award, a George Foster Peabody Award, numerous Emmys and Edward R. Murrows.
4. Before coming to CIR, I was the Communications Director at University of California, San Francisco – one of the nation’s top medical science institutions – for two years, the Assistant Managing Editor/Projects and Investigations at *The Sacramento Bee* from 2000-2010, and I served in numerous roles at the *Los Angeles Times* for more than a decade, ranging from State Specialist Reporter to Assistant City Editor.
5. CIR currently employs 40 full-time investigative journalists (which includes all radio producers, editors, and reporters). With the exception of four of our radio producers and two radio editors, all of CIR’s employees live in California and are based at CIR’s office in Emeryville, California. Of the four who don’t live in California, none of them are based in Maryland and no one from outside of CIR’s Emeryville headquarters worked on any of the stories that are the subject to this lawsuit.
6. Founded in 1977¹, CIR, a non-profit organization, is a pioneer in its approach to investigative reporting and collaboration. CIR partners with numerous other media organizations to ensure that our investigations – which often involve newsgathering activities that take many months if not years to complete – reach a broad and diverse

¹ A brief summary of CIR’s history is available at: <https://www.revealnews.org/our-history/>.

audience nationwide and, on occasion, around the world. CIR publishes its stories online at www.RevealNews.org and CIR partners with others to make our investigations available in print, television, radio/audio, video, documentary film and through live events. CIR's ultimate goal is to expose problems that can be solved. Among our successes in recent years are [Rape on the Night Shift](#) and [Rape in the Fields](#), both of which involved multi-faceted media partnerships and prompted legislation and other major reforms to protect low-income women from being sexually abused and exploited on the job. Our [investigation of opiate over-prescription](#) at the Veterans Administration hospital in Tomah, Wisconsin also sparked numerous [significant changes](#), including a [nationwide overhaul](#) of the VA's approach to pain management. Today, thanks in part to CIR's multiplatform investigation, 160,000 fewer veterans receive narcotic painkillers from the government, non-opioid therapies are being expanded and lives are being saved.

7. In a partnership with Public Radio Exchange ("PRX"), CIR co-produces the nationally-distributed "Reveal" radio show and podcast. "Reveal" is a one-hour weekly program that features CIR's reporting as well as stories from public radio stations and a wide range of media partners, both nonprofit and commercial. "Reveal" is currently syndicated to more than 364 radio stations across the country. Once CIR personnel in Emeryville upload CIR's radio show to PRX's website, public radio stations that have agreements with PRX can download the show and air it. In addition, there are nearly 800,000 downloads of CIR's Reveal Radio podcasts each month by listeners who access the program through iTunes and Stitcher. Listeners can also access Reveal Radio episodes directly through CIR's website. The server that supports CIR's website is also located in Emeryville.

8. CIR's investigative reporting has been recognized for its excellence, groundbreaking creativity and impact, including laws enacted as a direct result of its reporting. Recent awards include: several national Emmy Awards, a George Foster Peabody Award, a Military Reporters and Editors Award, a Barlett & Steele Gold Award for investigative business journalism, Alfred I. DuPont-Columbia University awards, a George Polk Award, IRE [Investigative Reporters and Editors] Awards for multiplatform journalism and an Edward R. Murrow Award for investigative reporting. CIR was a finalist for the Pulitzer Prize in 2012 and 2013 and a recipient of the 2012 MacArthur Award for Creative and Effective Institutions.
9. Plaintiff's lawsuit is based on CIR's investigation of Planet Aid, the focus of which was the federal government's multi-million dollar grants to Planet Aid that were intended to support farmers in Malawi, Africa. As detailed in the concurrently filed declarations of Matt Smith and Amy Walters, CIR's investigation of Planet Aid spanned the world, including extensive reporting in Malawi, Africa; in Denmark; and in Baja, Mexico, as well as newsgathering activities within the United States.
10. All of the stories that are the basis of Plaintiff's lawsuit were edited, recorded and posted online and made available to listeners and readers across the nation through the actions of CIR employees working in CIR's newsroom in Emeryville, California. CIR's Planet Aid investigation was featured in an hour-long Reveal Radio episode that was entirely edited and recorded by CIR employees working in CIR's office in Emeryville. Other than the reporting done by Matt Smith and Amy Walters in various parts of the world and in states other than Maryland, all other portions of CIR's Planet Aid investigation and associated

stories were prepared, edited and posted by CIR employees working in Emeryville to www.RevealNews.org.

11. RevealNews.org focuses on CIR's investigative reporting efforts nationwide and around the world. It includes no content and no subpart or section that is directed to Maryland residents and includes no Maryland-centric content or focus whatever. As a non-profit organization, CIR's web site does not include any advertising whatsoever.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed at Emeryville, California on October 27th, 2016.

/s/ Amy Pyle
Amy Pyle